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January 3, 2023

VIA ECF

Hon. Michael A. Hammer, U.S.M.J.
U.S. District Court District of New Jersey
50 Walnut Street
Newark, NJ 07101

Re: *Advanced Gynecology & Laparoscopy of North Jersey, P.C., et al.*
v. Cigna Health & Life Insurance Co., et al.
Case No. 19-cv-22234-ES-MAH

Dear Judge Hammer:

This law firm represents Defendants Cigna Health and Life Ins. Co. and Connecticut General Life Insurance Company ("Defendants") in the above-referenced matter. We write on behalf of the January 3, 2023 Text Order setting forth a briefing schedule for Defendants' Motion to Dismiss Plaintiffs' Third Amended Complaint. ECF No. 140. The parties previously submitted a proposed consent order requesting that Plaintiffs' Opposition be due on January 6, 2023 and Defendants' reply on February 17, 2023. ECF No. 139. The Text Order sets those deadlines as January 6, 2023 and February 6, 2023, respectively.

We write, with the consent of Plaintiffs, to request that Defendants' reply be due on February 17, 2023 as the present deadline of February 6, 2023 would cause hardship on counsel. I anticipate being the primary drafter of Defendants' reply brief, but have a previously-scheduled international vacation from February 1-5, 2023 and I will be in the First Circuit Court of Appeals on February 8, 2023 and the Second Circuit Court of Appeals on February 10, 2023 for oral arguments. Therefore, we respectfully request that Defendants be permitted additional time to file their reply brief to February 17, 2023.

We thank Your Honor for your kind attention to this matter.

Respectfully submitted,

s/ Caroline E. Oks

Caroline E. Oks

cc: All Counsel of Record (via ECF)

SO ORDERED

s/Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date:

1/3/2023